

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CHARLITAY VONNEDENNIS,

Plaintiff,

v.

LEGUM & NORMAN REALTY, INC.,

Defendant.

Civil Action No. AMD02-3439

CONSENT MOTION FOR ENLARGEMENT OF TIME
AND OF DISCOVERY DEADLINES

COMES NOW the Defendant, Legum & Norman Realty, Inc., by and through its attorneys, David A. Rosenberg, Kevin Kraham and Ford & Harrison LLP and pursuant to Fed. R. Civ. P. 7(b) and Local Rule 106, hereby submits this Consent Motion for Enlargement of Time and of the current discovery deadlines set forth in the Court's Order entered on February 24, 2003. In support thereof, Defendant refers the Court to the attached Memorandum of Points and Authorities.

Respectfully submitted,

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IN THE UNITED STATES DISTRICT COURT
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CHARLITAY VONNEDENNIS,

Plaintiff,

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LEGUM & NORMAN REALTY, INC.,

Defendant.

Civil Action No. AMD02-3439

**MEMORANDUM OF POINTS & AUTHORITIES IN SUPPORT OF
CONSENT MOTION FOR ENLARGEMENT OF TIME AND DISCOVERY
DEADLINES**

Defendant Legum & Norman Realty, Inc., by and through its attorneys, David A. Rosenberg, Kevin M. Kraham, and Ford & Harrison LLP, and pursuant to the Fed. R. Civ. P. 7(b) and Local Rule 106, hereby moves this Honorable Court for an Order modifying the current discovery deadlines set forth in the Court's Order entered on February 24, 2003, a copy of which is attached hereto as Exhibit A.

1. The lawsuit was filed on October 23, 2002 and a answer was timely filed by the Defendant on December 4, 2002.

2. Since the entry of the Consent Order on February 24, 2003, the parties continue to be engaged in the discovery process and continue to explore a possible resolution of this matter. Moreover, modification of the current discovery deadlines in this case will not affect the Court's management of this case nor prejudice any of the parties involved since no trial date has yet been assigned.

3. Defendant notes that the current discovery deadline in this case is June 4, 2003.

The parties have conferred and agreed that, in view of counsels' current work demands regarding numerous litigation-related deadlines and other matters, that a discovery extension is appropriate and have agreed on a new discovery deadline of September 12, 2003. During the extended discovery period, the parties anticipate noting and taking the depositions of various individuals. For example, in addition to taking Plaintiff's deposition, Defendant also intends to depose the various fact witnesses listed in Plaintiff's Response to Defendant's Interrogatories, as well as any other non-parties set forth and identified in Plaintiff's discovery responses. It is also anticipated that Plaintiff will also take depositions during the proposed extended discovery period.

4. Furthermore, the dates set forth in the attached Order reflect the parties' desire to allow themselves ample time to complete discovery and also pursue a possible resolution of this case without incurring what may prove to be unnecessary litigation costs and expenses.

5. Finally, counsel for Plaintiff has reviewed this Motion and consents to the relief sought therein.

Accordingly, the parties respectfully request that this Court grant their Motion for Enlargement of Discovery Deadlines, as set forth in the attached proposed Order.

RespectfullySubmitted,

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused a copy of the foregoing
CONSENT MOTION FOR AN ENLARGEMENT OF TIME AND DISCOVERY DEADLINES
MEMORANDUM IN SUPPORT THEREOF AND PROPOSED ORDER to be served upon the
following counsel of record via electronic mail on April 3, 2003:

Mark W. Howes, Esq.
mwhowes@aol.com

Kevin M. Kraham
KEVIN M. KRAHAM

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CHARLITA YVONNE DENNIS,

Plaintiff,

v.

LEGUM & NORMAN REALTY, INC.,

Defendant.

Civil Action No. AMD02-3439

ORDER

THIS DAY came the Defendant, Legum & Norman Realty, Inc. by and through its counsel, on its Consent Motion for Enlargement of Time And Discovery Deadlines and Plaintiff Charlita Yvonne Dennis, by and through her counsel, expressing her consent to the Motion, and the matter having been considered by the Court, it is hereby

ORDERED that the current deadlines set forth in the Court's Order of February 24, 2003 shall be modified as follows:

1. Defendant's Rule 26(a)(2) disclosures re __experts July 23, 2003
2. Plaintiff's Rebuttal Rule 26(a)(2) disclosures re_experts August 4, 2003
3. Rule 26(e)(2) supplementation of disclosures and responses August 21, 2003
4. Discovery Deadline; Submission of Status Report September 12, 2003
5. Requests for Admission September 25, 2003
6. Dispositive Pretrial Motions Deadline October 22, 2003

Dated: _____

ANDREM.DAVIS
UnitedStatesDistrictJudge

Copiesto:

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